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Attorneys for Defendants Kevin Long,
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Brent Smith, and Spencer Taylor

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION

KATE GRANT,

Plaintiff,

v.

KEVIN LONG; MILLCREEK
COMMERCIAL PROPERTIES, LLC;
COLLIERS INTERNATIONAL; BRENT
SMITH; SPENCER TAYLOR; BLAKE
MCDUGAL; and MARY STREET,

Defendants.

STIPULATED MOTION FOR
EXTENSION OF TIME FOR KEVIN
LONG, MILLCREEK COMMERCIAL
PROPERTIES, LLC, BRENT SMITH,
AND SPENCER TAYLOR TO
RESPOND TO COMPLAINT

Civil No. 2:23-cv-00936-DAO

Magistrate Judge Daphne A. Oberg

Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, defendants Kevin Long ("Long"), Millcreek Commercial, LLC ("Millcreek"), Brent Smith ("Smith"), and Spencer Taylor ("Taylor"), on the one hand, and plaintiff Kate Grant, on the other hand, through their respective counsel of record, hereby stipulate and move the Court to extend the due date through and

including April 1, 2024 for Long, Millcreek, Taylor, and Smith (the "Moving Defendants") to file a response to the Complaint (Dkt. 3) in this matter.

Good cause exists for the Moving Defendants' requested extension because they need additional time to gather documents and investigate the claims prior to responding to the Complaint. In addition, although Taylor, Millcreek, Smith, and Long's responses to the Complaint were due February 2, 2024, January 30, 2024, January 30 2024, and February 22, 2024, respectively, their delay in responding is due to excusable neglect because they were not able to officially engage counsel in this case until on or about February 16, 2024 as a result of unexpected delays in addressing potential insurance coverage issues, potential conflicts of interest, and potential representation issues. Indeed, while the undersigned counsel for Taylor is appearing on his behalf for the limited purpose of obtaining this requested extension, Mr. Taylor will be represented by separate counsel in this case going forward, including in responding to the Complaint. Additionally, plaintiff's counsel previously agreed to the requested extension while the Moving Defendants were resolving the aforementioned issues. Consequently, good cause exists for the requested extension, and any delay in obtaining the extension was a result of excusable neglect.

A copy of the proposed Order Extending Time to Respond to Complaint is attached as Exhibit "A."

DATED this 23rd day of February, 2024.

PARR BROWN GEE & LOVELESS

By: /s/ Rodger M. Burge

Terry E. Welch
Bentley J. Tolk
Rodger M. Burge
Attorneys for Defendants Kevin Long,
Millcreek Commercial Properties, LLC, Brent
Smith, and Spencer Taylor

CHRISTIANSEN LAW, PLLC

By: /s/ Stephen K. Christiansen *

Stephen K. Christiansen
Randall S. Everett
Attorneys for Plaintiff
*Signed by Filing Attorney with Permission

CERTIFICATE OF SERVICE

I hereby certify that on this 23rd day of February, 2024 a true and correct copy of the foregoing STIPULATED MOTION FOR EXTENSION OF TIME FOR KEVIN LONG, MILLCREEK COMMERCIAL PROPERTIES, LLC, BRENT SMITH, AND SPENCER TAYLOR TO RESPOND TO COMPLAINT was served via electronic service on the following:

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